IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

IN RE:

LUIS ALICEA LEBRON CASE NO.: 10-00222 SEK

DEBTOR

CHAPTER 13

INDEX:

QUANTUM SERVICING, CORP. as agent Of D.B. Structured Products, Inc. MOVANTS

11 USC 362(d)(1)

V
LUIS ALICEA LEBRON and
JOSE CARRION,
CHAPTER 13 TRUSTEE
RESPONDENTS

ANSWER TO CREDITOR'S MOTION FOR RELIEF FROM STAY

TO THE HONORABLE COURT:

The Debtor/Respondent herein, by her attorney, respectfully represents:

- 1. On July 29, 2010, secured creditor Quantum Servicing Corp., notified Debtor of its motion for Relief from Stay, thus this answer is timely filed.
- 2. Creditor alleges that Debtor has accumulated 8 post petition arrears.
- 3. Debtor recognizes being in arrears with Creditor and will cure the arrears or submit an amended plan by the date of the hearing scheduled on August 25, 2010.

WHEREFORE, Debtor hereby respectfully requests that this Honorable Court deny creditor's motion for relief from stay.

CERTIFICATE OF SERVICE: I hereby certify that on August 12,

Luis Alicea Lebron Case No. 10-00022 SEK Answer to Motion for Relief from Stay

2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notifications of such filing to the following: Jose Carrion, Chapter 13 Trustee, and I further certify that I have mailed by Unites States Postal Service the document to the creditor through their legal representative Igor J Dominguez, Esq. at 1225 Ponce de Leon, Suite 1105, San Juan, PR 00907-3945.

August 12, 2010

Sonia A. Rodríguez Rivera 117414

Otto E. Landron Pérez 202706

Carlo J Rodríguez Puigdollers 227001

Landrón & Rodríguez Law Offices

Attorneys for the Debtor

PO Box 52044

Toa Baja, PR 00950-2044

Tel 795-0390 / Fax 795-2693

Corozal: 802-3844 Tel & Fax

Email: cjrplaw@onelinkpr.net